

FILED

April 17, 2024

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

By: JG

Deputy

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADAM ETWAROO,

Defendant.

Case No: EP:24-CR-00840-KC

INDICTMENT

CT 1: 18 U.S.C. 922 (a)(1)(A) - Engaging in the Business Without a License (Dealing Firearms);

CT 2: 18 U.S.C. 922 (a)(1)(A) - Engaging in the Business Without a License (Manufacturing Firearms);

Notice of Government's Demand for Forfeiture

THE GRAND JURY CHARGES:

COUNT ONE

Beginning on or about the November 9, 2023, and continuing until on or about March 6, 2024, in the Western District of Texas, and elsewhere, the defendant,

ADAM ETWAROO,

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT TWO

Beginning on or about the November 9, 2023, and continuing until on or about March 6, 2024, in the Western District of Texas, and elsewhere, the defendant,

ADAM ETWAROO,

not being a licensed manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of manufacturing firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE

[See Fed. R. Crim. P. 32.2]

I.

Firearm Violations and Forfeiture Statutes

[Title 18 U.S.C. §§ 922(a)(1)(A) and 924(a)(1)(D), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the foregoing criminal violations set forth in Counts One and Two, the United States of America gives notice to Defendant **ADAM ETWAROO** of its intent to seek the forfeiture of certain property upon conviction pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c). Section 924 states, in pertinent part, the following:

Title 18 U.S.C. § 924.

* * *

(d)(I) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . of section 922 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . . or any violation of any other criminal law of the United States...

II.

NFA Violation and Forfeiture Statutes

[Title 26 U.S.C. §§ 5861(d), subject to forfeiture pursuant to Title 26 U.S.C § 5872, as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the foregoing criminal violation set forth in Count Three, the United States gives notice to Defendant **ADAM ETWAROO** of its intent to seek forfeiture of certain property upon conviction pursuant to Fed. R. Crim. P. 32.2 and Title 26 U.S.C. § 5872, as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states:

Title 26 U.S.C. § 5872. Forfeitures

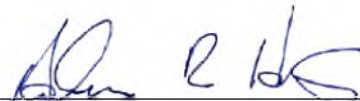
(a) Laws Applicable.—Any firearm involved in any violation of the provisions of this chapter shall be subject to seizure and forfeiture, and (except as provided in subsection (b)) all the provisions of internal revenue law relating to searches, seizures, and forfeitures of unstamped articles are extended to and made to apply to the articles taxed under this chapter, and the persons to whom this chapter applies.

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

BY:


Assistant United States Attorney